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17 UNITED STATES DISTRICT COURT

18 DISTRICT OF NEVADA

19 * * *

20 **James M. Herndon,**

21 CASE NO.: 2:19-cv-00018-GMN-NJK

22 Plaintiff,

23 vs.

24 **City of Henderson**, a political
25 subdivision of The State of Nevada; **Sgt.**
26 **M. Gillis**, individually and in his official
capacity as a police officer; **Officer L.**
27 **Good**, individually and in his official
capacity as a police officer; **Officer A.**
28 **Nelson**, individually and in his official
capacity as a police officer; **Officer D.**
Capacity as a police officer; **Officer D.**
Capacity as a police officer; **Officer E.**
Capacity as a police officer; **Officer F.**
Capacity as a police officer; Doe Officers
I through X, inclusive and Roe Entities I
through X, inclusive

29 **Stipulation and Order to Extend**
30 **Briefing Deadlines (ECF # 55)**

31 Defendants.



1 Plaintiff, James Herndon, through his counsel of record, Marjorie L. Hauf, Esq. and
 2 Matthew G. Pfau, Esq.. of H & P LAW, and Defendants, City of Henderson, Sgt. M.
 3 Gillis, Officer L. Good, Officer A. Nelson, Officer D. Nerbonne, Officer D. Russo, and
 4 Officer E. Vega through their counsel of record, Nicholas G. Vaskov, Esq. and Nancy
 5 D. Savage, Esq. of CITY ATTORNEY'S OFFICE, do hereby stipulate and agree to
 6 Extend the due dates of Plaintiff's Opposition to Defendants, Sgt. M. Gillis, Officer L.
 7 Good, Officer A. Nelson, Officer D. Nerbonne, Officer D. Russo, and Officer E. Vega's
 8 Motion for Summary Judgment and Defendant's Reply in Support to Defendants, Sgt.
 9 M. Gillis, Officer L. Good, Officer A. Nelson, Officer D. Nerbonne, Officer D. Russo,
 10 and Officer E. Vega's Motion for Summary Judgment.

11 Currently, Plaintiff's Opposition is due November 16, 2020. Plaintiff and
 12 Defendant agree to Extend the Deadline for Plaintiff to file his Opposition to
 13 December 2, 2020 and for Defendant to file their Reply in Support to
 14 December 21, 2020. The extensions are being requested in good faith and not for
 15 the purpose of delay. The extensions are being requested as the issues to be briefed
 16 are extensive and complicated. The parties anticipate that additional time, from that
 17 provided in the applicable court rules, will be needed to adequately address the
 18 issues and complete their respective briefings for submission to the court.

19

20 **Stipulation**

21 It is hereby STIPULATED between James Herndon, through his counsel of record,
 22 Marjorie L. Hauf, Esq. and Matthew G. Pfau, Esq.. of H & P LAW, and Defendants,
 23 City of Henderson, Sgt. M. Gillis, Officer L. Good, Officer A. Nelson, Officer D.
 24 Nerbonne, Officer D. Russo, and Officer E. Vega through their counsel of record,
 25 Nicholas G. Vaskov, Esq. and Nancy D. Savage, Esq. of CITY ATTORNEY'S OFFICE,
 26 to Extend Breifing Deadlines Related to Defendants, Sgt. M. Gillis, Officer L. Good,
 27 Officer A. Nelson, Officer D. Nerbonne, Officer D. Russo, and Officer E. Vega's Motion
 28 for Summary Judgment and Defendant's Reply in Support to Defendants, Sgt. M.



1 Gillis, Officer L. Good, Officer A. Nelson, Officer D. Nerbonne, Officer D. Russo, and
2 Officer E. Vega's Motion for Summary Judgment, ECF # 55.

3 IT IS FURTHER STIPULATED that Plaintiff's Opposition to Defendant, Sgt. M.
4 Gillis, Officer L. Good, Officer A. Nelson, Officer D. Nerbonne, Officer D. Russo, and
5 Officer E. Vega's Motion for Summary Judgment must be filed by December 2, 2020.

IT IS FURTHER STIPULATED that Defendants, Sgt. M. Gillis, Officer L. Good, Officer A. Nelson, Officer D. Nerbonne, Officer D. Russo, and Officer E. Vega's Reply in Support of Motion for Summary Judgment must be filed by December 21, 2020.

DATED this 10th day of November 2020

Respectfully submitted by:

H & P LAW

/s/ Marjorie L. Hauf, Esq.

Marjorie L. Hauf, Esq.

Nevada Bar No.: 8111

Matthew G. Pfau, Esq.
Matthew P. N. 1148

Approved as to form and content:

CITY ATTORNEY'S OFFICE

/s/ Nancy Savage, Esq.

Nicholas G. Vaskov, Esq.

Nevada Bar No.: 8298

Nancy D. Savage, Esq.
Montgomery, N.Y. 10549

Attorneys for Plaintiff,
James M. Herndon

Attorneys for Defendants,
*City of Henderson, Sgt. S. Gillis, and
Officers L. Good, A. Nelson, D.
Nerbonne, D. Russo, and E. Vega*

IT IS SO ORDERED.

Dated this 18 day of November, 2020


Gloria M. Navarro, District Judge
UNITED STATES DISTRICT COURT